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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2013-665

12 **RITA ANNE ILIAKIS, aka RITA ILIAKIS**
13 **5301 Beethoven St, Suite 200A**
Los Angeles, CA 90066

A C C U S A T I O N

14 **Registered Nurse License No. 634246**

15 Respondent.

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18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about March 12, 2004, the Board of Registered Nursing issued Registered
24 Nurse License Number 634246 to Rita Anne Iliakis, aka Rita Iliakis (Respondent). The
25 Registered Nurse License was in full force and effect at all times relevant to the charges brought
26 herein and will expire on November 30, 2013, unless renewed.

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1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
2 included in a stipulated settlement.

3 **CAUSE FOR DISCIPLINE**

4 **(Discipline by Out of State Licensing Agency)**

5 8. Respondent is subject to disciplinary action under Code section 2761 subdivision
6 (a)(4), in that Respondent sustained disciplinary action against her Colorado Nursing License.

7 The circumstances are as follows:

8 9. On or about May 28, 2010, Respondent was employed by a staffing agency and was
9 assigned to work at the Department of Veterans Affairs in Denver, Colorado. When she reported
10 to work, a co-worker detected the odor of alcohol on her breath. A supervisor asked Respondent
11 to submit a breath sample. The results were positive with a reading of .101. Respondent reported
12 using alcohol as a sleep aid.

13 10. On or about September 29, 2010, the Colorado State Board of Nursing issued a Letter
14 of Admonition to Respondent. The Colorado Board found Respondent violated the Colorado
15 Nursing Practice Act Code sections 12-38-117(l), (f) and (i), for negligently or willfully
16 practicing nursing in a manner which fails to meet generally accepted standards; and for
17 excessive uses or abuses of alcohol.

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19 **PRAYER**

20 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
21 and that following the hearing, the Board of Registered Nursing issue a decision:

22 1. Revoking or suspending Registered Nurse License Number 634246, issued to Rita
23 Anne Iliakis, aka Rita Iliakis;

24 2. Ordering Rita Anne Iliakis, aka Rita Iliakis to pay the Board of Registered Nursing
25 the reasonable costs of the investigation and enforcement of this case, pursuant to Code section
26 125.3; and

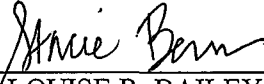
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1 3. Taking such other and further action as deemed necessary and proper.
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5 DATED:

February 21, 2013

for 

LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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